

**SUPPRESSED**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

MAY 28 2014

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOEY D. WOOD,

Defendant.

No.

**4:14CR00165 CDP/TCM**

INDICTMENT

Count 1

The Grand Jury charges:

On or about January 18, 2012, in the Eastern District of Missouri,

JOEY D. WOOD,

the defendant herein, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of eight thousand six hundred sixty-one dollars (\$8,661.00) for the year 2011, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that JOEY D. WOOD, the defendant herein, did prepare a U.S. Individual Income Tax Return for JOEY D. WOOD, the defendant herein, for the year 2011, which stated that JOEY D. WOOD, the defendant herein, was entitled to a refund of income taxes in the amount of eight thousand six hundred sixty-one dollars (\$8,661.00), for the year 2011, when in truth and in fact, as JOEY D. WOOD, the defendant herein, well knew, JOEY D. WOOD, the defendant herein, was not entitled to receive a refund of income taxes in the amount of eight thousand six hundred sixty-one dollars (\$8,661.00), for the year 2011.

In violation of Title 18, United States Code, Section 287.

Count 2

The Grand Jury charges:

On or about January 30, 2013, in the Eastern District of Missouri,

JOEY D. WOOD,

the defendant herein, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of eight thousand four hundred thirty-seven dollars (\$8,437.00) for the year 2012, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that JOEY D. WOOD, the defendant herein, did prepare a U.S. Individual Income Tax Return for JOEY D. WOOD, the defendant herein, for the year 2012, which stated that JOEY D. WOOD, the defendant herein, was entitled to a refund of income taxes in the amount of eight thousand four hundred thirty-seven dollars (\$8,437.00), for the year 2012, when in truth and in fact, as JOEY D. WOOD, the defendant herein, well knew, JOEY D. WOOD, the defendant herein, was not entitled to receive a refund of income taxes in the amount of eight thousand four hundred thirty-seven dollars (\$8,437.00), for the year 2012.

In violation of Title 18, United States Code, Section 287.

Count 3

The Grand Jury charges:

On or about February 15, 2013, in the Eastern District of Missouri,

JOEY D. WOOD,

the defendant herein, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income

taxes in the amount of one thousand three hundred thirty-four dollars (\$1,334.00) for the year 2012, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that JOEY D. WOOD, the defendant herein, did prepare a U.S. Individual Income Tax Return for N.M. for the year 2012, which stated that N.M. was entitled to a refund of income taxes in the amount of one thousand three hundred thirty-four dollars (\$1,334.00), for the year 2012, when in truth and in fact, as JOEY D. WOOD, the defendant herein, well knew, N.M. was not entitled to receive a refund of income taxes in the amount of one thousand three hundred thirty-four dollars (\$1,334.00), for the year 2012.

In violation of Title 18, United States Code, Section 287.

Count 4

The Grand Jury charges:

On or about February 1, 2012, in the Eastern District of Missouri,

JOEY D. WOOD,

the defendant herein, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of three thousand three hundred dollars (\$3,300.00) for the year 2011, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that JOEY D. WOOD, the defendant herein, did prepare a U.S. Individual Income Tax Return for M.H. for the year 2011, which stated that M.H. was entitled to a refund of income taxes in the amount of three thousand three hundred dollars (\$3,300.00), for the year 2011, when in truth and in fact, as JOEY D. WOOD, the defendant herein, well knew, M.H. was not entitled to receive a refund of income taxes in the amount of three thousand three hundred dollars (\$3,300.00), for the year 2011.

In violation of Title 18, United States Code, Section 287.

Count 5

The Grand Jury charges:

On or about February 5, 2013, in the Eastern District of Missouri,

JOEY D. WOOD,

the defendant herein, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of two thousand three hundred twenty-three dollars (\$2,323.00) for the year 2012, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that JOEY D. WOOD, the defendant herein, did prepare a U.S. Individual Income Tax Return for M.H. for the year 2012, which stated that M.H. was entitled to a refund of income taxes in the amount of two thousand three hundred twenty-three dollars (\$2,323.00), for the year 2012, when in truth and in fact, as JOEY D. WOOD, the defendant herein, well knew, M.H. was not entitled to receive a refund of income taxes in the amount of two thousand three hundred twenty-three dollars (\$2,323.00), for the year 2012.

In violation of Title 18, United States Code, Section 287.

Count 6

The Grand Jury charges:

On or about February 2, 2012, in the Eastern District of Missouri,

JOEY D. WOOD,

the defendant herein, did make and present to the Internal Revenue Service, an agency of the Department of the Treasury, a claim against the United States for payment of a refund of income taxes in the amount of two thousand nine hundred sixty-one dollars (\$2,961.00) for the year 2011, knowing that the claim was false, fictitious and fraudulent as to a material matter, in that JOEY D. WOOD, the defendant herein, did prepare a U.S. Individual Income Tax Return for

S.F. for the year 2011, which stated that S.F. was entitled to a refund of income taxes in the amount of two thousand nine hundred sixty-one dollars (\$2,961.00), for the year 2011, when in truth and in fact, as JOEY D. WOOD, the defendant herein, well knew, S.F. was not entitled to receive a refund of income taxes in the amount of two thousand nine hundred sixty-one dollars (\$2,961.00), for the year 2011.

In violation of Title 18, United States Code, Section 287.

Count 7

The Grand Jury charges:

On or about May 17, 2013, in the Eastern District of Missouri,

JOEY D. WOOD,

the defendant herein, having been convicted previously of a felony crime punishable by a term of imprisonment exceeding one year under the laws of the State of Missouri, that is, Unlawful Use of a Weapon, on or about December 9, 2004, in Cause Number 041-0982, in the Circuit Court of the City of St. Louis, Missouri, did knowingly possess one or more firearms, which traveled in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1), and punishable under Title 18, United States Code, Section 924(a)(2).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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STEVEN A. MUCHNICK  
Assistant United States Attorney